

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR  
SYSTEMS PRODUCTS LIABILITY  
LITIGATION

Master File No. 2:12-MD-02327  
MDL 2327

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ETHICON NON-REVISION PTO 298  
(ELECTION WAVE) CASES LISTED IN  
EXHIBIT A

JOSEPH R. GOODWIN  
U.S. DISTRICT JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF  
STANLEY ZASLAU FOR NON-REVISION PTO 298 (ELECTION WAVE)**

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motions filed in relation to Stanley Zaslau for Ethicon Waves 1, 3 and 4, Dkts. 2026, 2827, and 3665 (motions), Dkts. 2030 and 3669 (memorandums in support), and the reply briefs filed in Ethicon Waves 1 and 4, Dkts. 2220 and 3859 (replies). Plaintiffs respectfully request that the Court exclude Stanley Zaslau's testimony, for the reasons expressed in the Waves 1, 3 and 4 briefing. This notice applies to the following Non-Revision PTO 298 (Election Wave) cases identified in Exhibit A attached hereto.

Dated: December 14, 2018

Respectfully submitted,  
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**EXHIBIT A**

Benson, Kathy Myers	2:16-cv-11679
Derrisseaux, Verla	2:16-cv-01908
Gang, Debra	2:17-cv-01127
Green, Patricia	2:13-cv-26358
Simpson, Nebra	2:14-cv-00055

**CERTIFICATE OF SERVICE**

I hereby certify that on December 14, 2018, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ D. Renee Baggett  
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